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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

BLUESTONE INVESTMENT INC.,
WORLD EDUCATION ASSOCIATION,
INC., IRENE CHAN, LISHAN ZHANG,

Plaintiffs,

v.

QIZHONG HU, PATTEN HOLDING
LLC, PATTEN UNIVERSITY, LLC,
JPMORGAN CHASE BANK, N.A.,
ANDREW BABES, JINGLING LI,
WILLIAM SAWYER, SCOTT ETHAN
VICTOR, and DOES 1-25, inclusive.

Defendants.

CASE NO. 3:25-cv-05396-LB

**STIPULATION AND ORDER TO
EXTEND DEADLINES RELATING
TO DEFENDANTS JP MORGAN
CHASE BANK, N.A. AND ANDREW
BABES'S MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

Civil Local Rule 6-2

1 WHEREAS, Plaintiffs Bluestone Investment Inc., World Education Association, Inc.,
2 Irene Chan, and Lishan Zhang (“Plaintiffs”) filed their Complaint in the above-captioned matter
3 on June 27, 2025 (Dkt. 1);

4 WHEREAS, Plaintiffs served the Complaint on Defendants JP Morgan Chase Bank, N.A.,
5 (“JP Morgan”) and Andrew Babes (“Babes”) on July 8, 2025 and July 10, 2025, respectively (*see*
6 Dkt. 10, Exs. 3, 4);

7 WHEREAS, the parties stipulated to extend JP Morgan and Babes’s deadline to respond to
8 the Complaint by 28 and 26 days, from July 29, 2025 and July 31, 2025 to August 26, 2025 (Dkt.
9 13);

10 WHEREAS, on August 26, 2025, JP Morgan and Babes filed a Motion to Dismiss the
11 claims asserted against them and noticed a hearing on that motion for October 2, 2025 (Dkt. 38);

12 WHEREAS, pursuant to Civil Local Rule 7-3(a) and (c), the deadline for Plaintiffs to file
13 their opposition to JP Morgan and Babes’s Motion to Dismiss is September 9, 2025, and the
14 deadline for JP Morgan and Babes to file their reply is September 16, 2025;

15 WHEREAS, counsel for Plaintiffs and Defendants JP Morgan and Babes have met and
16 conferred regarding the current deadlines for the briefing schedule on JP Morgan and Babes’s
17 Motion to Dismiss and have reached an agreement to extend Plaintiffs deadline by 2 days, to
18 September 11, 2025, in light of the recent Labor Day holiday, which would extend the deadline for
19 JP Morgan and Babes’s reply under Civil Local Rule 7-3(c) to September 18, 2025;

20 WHEREAS, this extension will not affect any other dates or deadlines ordered by the
21 Court;

22 WHEREAS, pursuant to Civil Local Rule 6-2(a), the stipulated request made herein is
23 accompanied by the Declaration of James D. Judah, dated September 2, 2025, in support hereof;

24 **NOW, THEREFORE**, Plaintiffs, JP Morgan, and Babes hereby stipulate and request that
25 the Court enter an Order as follows:

- 26 1. The deadline for Plaintiffs to file and serve an opposition to JP Morgan and Babes’s
27 Motion to Dismiss shall be extended to September 11, 2025; and
28

2. The deadline for JP Morgan and Babes to file and serve a reply brief support of their Motion to Dismiss shall be extended to September 18, 2025.

Respectfully submitted,

DATED: September 2, 2025

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ James D. Judah

James D. Judah

Darice Xue

Attorneys for Plaintiffs

DATED: September 2, 2025

GREENBERG TRAURIG, LLP

/s/ Todd Pickles

Todd Pickles

*Attorneys for Defendants JP Morgan Chase Bank,
N.A. and Andrew Babes*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 3, 2025



Honorable Laurel Beeler
United States Magistrate Judge